



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

File 6400.5.7

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NOV 04 1993

900 North Skyline, Idaho Falls, ID 83402-1718, (208) 528-2650

Cecil D. Andrus, Governor

Environmental Restoration
Division

November 2, 1993

Ms. Alice Williams
Director Environmental Restoration Program
U.S. Department of Energy
Idaho Field Office
785 DOE Place
Idaho Falls, Idaho
83401-1562

SUBJECT: IDHW-DEQ Recommendations for O.U. 5-07 Track Two Summary
Report

Ms. Williams:

The Idaho Department of Health and Welfare, Division of Environmental Quality (IDHW/DEQ) has reviewed the final Track Two Summary report for the characterization and assessment of Operable Unit 5-07 (ARA-02 and -03) and offers the following recommendations for future actions at this OU:

Description of Operable Unit 5-07

OU 5-07 is composed of two distinct areas adjacent to the Auxiliary Reactor Area One (ARA I) that have been given the designations of ARA-02; the Sanitary Sewer System, and ARA-03; 900 square feet of radioactively surficially contaminated soils, previously known as the "Lead Sheet Area." The ARA-02 sewer system is presently unused, but intact and the three existing septic tanks contain sludges contaminated with metals, radionuclides and volatile organic compounds. The radioactive contamination in the ARA-03 surficial soils area is concentrated in the upper 24" of soil and access to the area is restricted.

Recommendations

Within the body of the report (Section 7), the DOE-ER program, recommends remediating the sites under DOE's "best management practices." IDHW understands that DOE's intention is to clean up the soil contamination at ARA-02 (Lead Sheet Area) and remove the sludges and decontaminate the tanks at ARA-03 (ARA I & II Sanitary Septic System). IDHW agrees with the

reports conclusion to remediate both areas and re-evaluate them in the comprehensive WAG-05 RI/FS.

However, as site ARA-03 presents unacceptable risk due to exposure to direct ionizing radiation, IDHW recommends that DOE maintain present administrative controls to limit personnel exposure until the area no longer poses an unacceptable human health risk. It should be noted, that in DOE's transmittal cover letter for the final report, that only ARA-02 was recommended for further evaluation under the Comprehensive WAG-05 RI/FS. It is assumed that this was an editorial oversight and that DOE's intention is to re-evaluate both areas as stated in the report. Additionally, it is expected that DOE will provide the EPA and IDHW with written notification regarding the final actions on ARA-02 and -03. Following the acceptable cleanup of both sites, DOE will submit a Technical Memorandum containing validated sampling results, which demonstrates the attainment of project goals.

This recommendation to move the operable unit to the Comprehensive RI does not preclude DOE's intention to perform "best management practices." Further, if these two sites are remediated to those concentrations which present no unacceptable risk under CERCLA guidance, by implementation of DOE's best management practices, then no further remedial action should be required following re-evaluation of the site risks within the comprehensive WAG 5 RI/FS.

If you should have any question, please feel free contact me at your earliest convenience.

Respectfully,



Thomas M. Stoops, P.G.
WAG 5 Manager
Remediation Bureau

TMS/is

cc: Talley Jenkins, DOE-ID
Wayne Pierre, EPA-Region 10
Howard Blood, EPA Region 10
Dean Nygard, IDHW-DEQ
M. Shawn Rosenberger, IDHW-DEQ
Carol Strong, Geotech
File-Boise